

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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YAACOV APELBAUM, a New York resident,  
and XRVISION, LTD., a New York  
corporation,

Plaintiffs,

v.

STEPHANIE LAMBERT, a Michigan resident,  
and THE LAW OFFICE OF STEPHANIE L  
LAMBERT, PLLC, A Michigan professional  
limited liability company, and BILL  
BACHENBERG, a Pennsylvania resident,

Defendants.

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**MEMORANDUM IN SUPPORT OF MOTION  
TO DISMISS DEFENDANT BILL BACHENBERG WITH PREJUDICE**

Now Come Plaintiffs, Yaacov Apelbaum and XRVision, Ltd., by and through their undersigned counsel, hereby and state for their Brief in Support of their Motion to Dismiss Defendant Bill Bachenberg with Prejudice that Plaintiffs rely on the facts and law set forward in the Motion to Dismiss Defendant Bill Bachenberg with Prejudice.

Respectfully Submitted

/s/ John C. Burns

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**CERTIFICATE OF SERVICE**

The undersigned certifies that on June 18, 2025, a true and accurate copy of the foregoing was electronically filed with the Clerk of the Court using the Court's CM/ECF system, which will send notification to all counsel of record.

/s/ John C. Burns